

The Law Office of Ryan Lozar, P.C.
305 Broadway, 10th Floor, New York, NY 10007
Tel: (310) 867-1562; Alternate Tel: (646) 666-8262; Fax (877) 666-4456
ryanlozar@gmail.com
www.ryanlozar.com/www.luchaportusderechos.com



OCTOBER 21, 2016

The Honorable Ramon E. Reyes
United States District Court for the Eastern District of New York Shira Siskind, Esq.

Re: Anthony, et al. v. City of N.Y., et al., No. 15 Civ. 6364 (PKC) (RER)

Dear Judge Reyes:

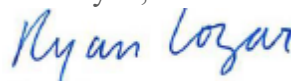
I represent Plaintiffs in the above-captioned Section 1983 litigation. I write to provide a joint status report about the Parties' progress in this case and to make a joint motion for an in-person conference on November 8 or 9 if the Court's schedule allows. The Parties anticipate being able to set firm pretrial dates with the Court at that conference regarding the balance of discovery, dispositive motion practice and/or the submission of a JPTO.

Party depositions are complete. Paper discovery is very nearly complete. Continuing delay relating to disciplinary files is the primary reason this remains open. As discussed with the Court previously, Defendants have found the timing of these files' delivery to be largely outside of their control. It should be noted that Defendants have made a fair amount disciplinary files available for Plaintiffs' Counsel to review as those files have been delivered to Defendants by third parties.

The Parties continue to meet and confer about a handful of document production disputes. If we cannot resolve these amicably, Plaintiffs will file motions in accordance with the following proposed schedule which will tee up the case for productive discussion during the Court's upcoming conference with the Parties:

- Defendants will make rolling productions between now and the conference.
- On or before Friday, October 28, 2016, Plaintiffs will file letter motions relating to any discovery disputes that the Parties cannot settle amicably.
- On or before Friday, November 4, 2016, Defendants will file their opposition.
- On or before Monday, November 7, 2016, Defendants will produce all paper records that the Parties do not dispute should be produced. Also on November 7, 2016, the Parties will file a joint status report confirming that fact so that the Court will know prior to the in-person conference.

Thank you,



Ryan Lozar